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*Attorneys for Defendant The State of Nevada,
ex rel. its Department of Corrections*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DONALD WALDEN JR, NATHAN
ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE STATE OF NEVADA, *EX REL.* ITS
NEVADA DEPARTMENT OF
CORRECTIONS, and DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR ENLARGEMENT
OF TIME FOR RESPONSIVE MOTIONS
AND [PROPOSED] ORDER THEREON**

(Second Request)

Plaintiffs DONALD WALDEN JR., NATHAN ECHEVERRIA, AARON DICUS,
BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR, and DANIEL TRACY on
behalf of themselves and all other similarly situated, and Defendant STATE OF NEVADA, *EX.*
REL. ITS DEPARTMENT OF CORRECTIONS (collectively “The Parties), by and through their
respective counsel of record, hereby stipulate and agree to extend the time for both Parties to file
their respective responsive pleadings as set forth below.

1 This stipulation is submitted in compliance with LR IA 6-1. The Parties are requesting
 2 these extension due to the volume of motions pending, the complexity and fact intensive nature
 3 of the responsive pleadings, counsels' professional commitments, existing workload, and the
 4 continued challenges of working remotely due to the COVID-19 crisis, including slower
 5 connectivity, communications delays, and obtaining records necessary to the motions. Good
 6 cause exists for the requested extensions.¹

7 Accordingly, the Parties further stipulate and agree to extend the deadlines as follows:

8 **1.** Plaintiffs' Opposition to NDOC's Motion to Exclude Evidence from Plaintiffs'
 9 Expert ERC (ECF No. 282) currently due 5/6/20 shall be extended one (1) week to on or before
 10 **Wednesday, May 13, 2020.** Defendant's Reply In Support Of shall be due on or before
 11 **Wednesday, May 27, 2020.**

12 **2.** Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on Sovereign
 13 Immunity (ECF No. 276) currently due 5/13/20 which shall remain unchanged. The Parties
 14 request that Defendant's Reply In Support Of shall be due on or before **Wednesday, June 3,**
 15 **2020.**

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 28 ¹ The Court granted the Parties First Request for Extension of time on 4/13/20 at ECF No. 287.

1 **3.** Plaintiffs' Opposition to NDOC's Motion for Summary Judgment on the Merits
2 of Plaintiffs FLSA Claims (ECF No. 283) currently due 5/20/20 which shall remain unchanged.
3 The Parties request that Defendant's Reply In Support Of shall be due on or before
4 **Wednesday, June 10, 2020.**

5 The Parties agree that the requested extension furthers the interest of this litigation and is
6 not being requested in bad faith or to delay these proceedings unnecessarily.

7 IT IS SO STIPULATED.

8
9 Dated: May 5, 2020.

 Dated: May 5, 2020.

10 THIERMAN BUCK LLP

 WILSON ELSE MOSKOWITZ,
 EDELMEYER & DICKER LLP

11 /s/Leah L. Jones

/s/James T Tucker

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19 Attorneys for Plaintiffs

20 **ORDER**

21 **IT IS SO ORDERED.**

22 Dated this 6th day of May, 2020.

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26 U.S. District Judge
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